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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	JOINTLY ADMINISTERED

**DEBTORS' LIMITED OBJECTION TO MOTION FOR APPOINTMENT
OF A MEMBER COMMITTEE**

The National Rifle Association of America (the “NRA”) and Sea Girt LLC (“Sea Girt”) (collectively, the “Debtors”) file this limited objection to the motion filed by Phillip Journey, Roscoe B. Marshall, Jr., Esther Schneider, and Owen Mills (collectively the “Movants”) seeking the appointment of an official NRA member committee (the “Motion”) [Docket No. 416], and state as follows:

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

I. PRELIMINARY STATEMENT

1. The Debtors do not oppose the appointment of a committee of NRA members in this case. However, the Debtors do not believe that Section 1102(a)(2) authorizes the appointment of an official member committee and object to the Movants' attempt to characterize NRA members as equity owners for purposes of Section 1102(a)(2). Under New York law, not-for-profit corporations like the NRA are prohibited from having shareholders. Treatment of NRA members as residual stakeholders for purposes of appointment of an official committee could yield unintended consequences on matters beyond the relief requested in the Motion, including plan solicitation requirements and the application of the absolute priority rule. As a result, the Debtors request that the Court's decision to appoint a member committee not be premised upon the treatment of NRA members as equity.

2. The Debtors also dispute, and object to, the Movants' unsupported assertion that the NRA's members are not adequately represented in this bankruptcy case. Contrary to the assertions in the Motion, the NRA's members are represented in this case by an engaged and informed board of directors who recently voted overwhelmingly to support the Debtors' ongoing restructuring efforts. That same board is elected by NRA members and therefore necessarily enjoys the members' support. While the Movants have formed an *ad hoc* committee of NRA members who appear to share a negative view of the NRA's existing board and management, they do not speak for the NRA's membership as a whole. The Debtors therefore believe that any official member committee appointed in this case should be fairly representative of the NRA membership and should not be dominated by a core group of like-minded members (and sitting directors) whose viewpoints and agenda are not shared by the NRA's duly elected board of directors. To this end, the Debtors request that any member committee be constituted in a manner that reflects a diversity of viewpoints and operates independently of the Movants.

3. Finally, the Debtors believe that the scope and role of any member committee should be appropriately limited to member-specific issues that are not already subsumed by the scope of the Official Committee of Unsecured Creditors in this case. The Debtors submit that most, if not all, of the Committee's ongoing efforts in these cases will inure to the benefit of the NRA's membership and that there are few, if any, areas related to the Debtors' reorganization in which the interests of the Committee and the NRA's members are not aligned. As a result, the Debtors submit that any order appointing a committee of NRA members should appropriately limit the committee's scope, authority, and budget to ensure there is no duplication of efforts with the existing Committee.

II. ARGUMENT & AUTHORITIES

A. Legal Standard for Appointment of an Additional Committee

4. Section 1102(a)(2) provides that the Court "may order the appointment of additional committees of creditors or of equity security holders if necessary to assure adequate representation of creditors or of equity security holders." Stated differently, Section 1102(a)(2) "permits the appointment of an additional committee . . . only if necessary to assure adequate representation." *In re Res. Cap., LLC*, 480 B.R. 550, 557 (Bankr. S.D.N.Y. 2012). The appointment of an additional committee under Section 1102(a)(2) "is an extraordinary remedy that courts are reluctant to grant." *Id.*

5. The party seeking the appointment of an additional committee bears the burden of proof. *In re SunEdison, Inc.*, 556 B.R. 94, 103 (Bankr. S.D.N.Y. 2016). The requirement that a moving party show that the appointment of an additional official committee is "necessary to assure adequate representation" has been described as ranging from a "high standard" to requiring a showing that an additional committee is "absolutely required," "essential," or "indispensable." *Id.* at 558 (internal quotations omitted). This standard is "far more onerous than if the statute merely

provided that a committee would be useful or appropriate.” *In re Eastman Kodak Co.*, No. 12-10202, 2012 WL 2501071, at *2 (Bankr. S.D.N.Y. Jun. 28, 2012).

B. Lack of Statutory Basis for the Appointment of an Official Member Committee

6. The Debtors note that the Movants have not identified a sound statutory basis for the appointment of an official NRA member committee. By its terms, Section 1102(a)(2) only authorizes the appointment of committees of “creditors” and “equity security holders.” Although the Movants purport to be creditors of the NRA, they do not move for appointment of a member committee on that basis, and they are not, and do not purport to be, equity security holders of the Debtors. Motion at ¶ 16 (“[T]he NRA’s members are not equity holders . . .”). As a result, Section 1102(a)(2) does not facially authorize the appointment of an official committee of NRA members.

7. In an analogous context, courts have held that the plain language of Section 1102(a)(2) does not authorize the appointment of committees other than committees of “creditors” and “equity security holders.” See *In re Finley, Kumble, Wagner, Heine, Underber, Manley, Myerson & Casey*, 85 B.R. 13, 16 (Bankr. S.D.N.Y. 1988) (no statutory basis for appointment of general partner committee); *In re Westgate Gen. P’ship*, 55 B.R. 560, 561 (Bankr. E.D. Pa. 1985) (same). In holding that Section 1102(a)(2) does not authorize the appointment of a general partner committee, the *Finley* court concluded that “the omission of [a] statutory provision for such a committee must be viewed as legislative policy.” 85 B.R. at 16. “[T]his is a straightforward application of the interpretive doctrine *expressio unius est exclusio alterius*—the expression of one thing is the exclusion of another.” *In re Caesars Enter. Op. Co., Inc.*, 526 B.R. 265, 268-89 (Bankr. N.D. Ill. 2015). “When a statute expressly grants courts the authority to take certain actions, that express grant implies the prohibition of other actions.” *Id.* at 263 (citing *Gomez v. United States*, 490 U.S. 858, 872 (1989)). Because the authority granted under Section 1102(a)(2) is expressly

limited to appointing committees of creditors and equity security holders, it impliedly precludes the appointment of an official NRA member committee unless those members fit the statutory definition of equity security holders.

8. Recognizing this limitation, the Movants attempt to characterize NRA members as the functional equivalent of equity security holders. Motion at ¶ 16. However, “equity security holder” is a defined term in the Bankruptcy Code and Movants themselves acknowledge that NRA members do not fit the statutory definition. *Id.* Relying on *In re E. Me. Elec. Coop., Inc.*, 121 B.R. 917 (Bankr. D. Me. 1990), Movants nonetheless attempt to circumvent the statutory limitations by likening themselves to equity owners of the NRA based on their various governance and membership rights. Motion at ¶ 17. New York not-for-profit corporations like the NRA are prohibited from having stock, shares, or shareholders and may only issue non-transferrable membership certificates or cards to evidence membership. N.Y. N-PCL § 501. Contrary to the holding in *E. Me. Elec. Coop.*, the non-transferable membership interests in the NRA do not fit within the statutory definition of “equity security” or other “security.” 11 U.S.C. §§ 101(15), (49). For example, unlike the co-op members in *E. Me. Elec. Coop.*, NRA members are not entitled to a distribution of the NRA’s residual assets upon dissolution. 121 B.R. at 931. Moreover, the court in *E. Me. Elec. Coop.* ultimately held that the members’ request for appointment of a committee was untimely, and therefore its analysis with respect to whether co-op members’ interests came within the purview of Section 1102(a)(2) is *dicta*. 121 B.R. at 933.

9. Given the foregoing, the Debtors submit that the Movants have not identified a proper statutory basis for appointment of an official committee unless NRA members are deemed to be the equivalent of “equity security holders” under Section 1102(a)(2). As noted above, however, treating NRA members as equity in this case could have far reaching ramifications on the Debtors’ reorganization efforts and on plan confirmation. The Debtors therefore object to the

Movants' efforts to characterize their interests as equity for purposes of Section 1102(a)(2). To the extent the Court elects to treat the NRA members as equity for purposes of appointment of an official committee, the Debtors request that such treatment be strictly limited to the appointment of a committee and that any order make clear that the NRA members are not deemed to be equity for any other purpose. In the alternative, the Court could consider the appointment of an unofficial advisory committee of NRA members without characterizing members as equity security holders.²

C. NRA Members are Adequately Represented by a Duly Elected Board of Directors

10. The Debtors also dispute the Movants' assertion that NRA members are not adequately represented in this case. The Movants' *ad hoc* member group is not representative of the NRA's membership as a whole. The NRA's members are adequately represented in this case by the NRA's board of directors. *Eastman Kodak Co.*, 2012 WL 2501071, at *2 (noting presumption that debtor's board represents interests of shareholders). Under the NRA bylaws, one third of the NRA's 76 board members are elected annually through a vote of the NRA membership. That duly elected board of directors recently voted 44 to 1 in support of the Debtors' reorganization efforts and is scheduled to meet again in early May for a further update on the bankruptcy proceedings. *See* Docket No. 440. The Movants' allegations that the board's "inaction" and "lack of oversight" necessitate appointment of a member committee in this case are therefore unfounded.

11. The board's recent vote also undercuts Journey's complaint that the board "has not presented a unified front on behalf of NRA members." Motion at ¶ 26. In fact, the Movants themselves were the only board members present at the March meeting that did not vote to support the Debtors' reorganization. *See* Docket No. 440-1. Thus, it appears that the Movants' real complaint is not that the board lacks a unified view for the direction of the NRA, but that the rest

² The appointment of an advisory committee of members in a non-profit debtor was recently requested in *In re Brazos Elec. Power Coop., Inc.*, No. 21-30725 (Bankr. S.D. Tex. Apr. 9, 2021) [Docket No. 413].

of the board does not share the Movants' view. Members' support for the current board and reorganization strategy is reflected in the NRA's strong membership, which has grown steadily since the petition date, and successful fundraising—with monthly donations (above and beyond standard dues) increasing nearly 50 percent from January to March. Absent a showing that NRA members are not adequately represented by the board, the Court should not permit the Movants to use the leverage (and budget) of an official committee under Section 1102(a)(2) to relitigate issues they have already lost at the board level and to pursue an agenda that the rest of the board has firmly rejected.

12. While the Debtors dispute the Movants' factual allegations regarding the basis for the appointment of a member committee, the Debtors do not oppose the appointment of a member committee to avoid any doubt that the interests of the NRA's members are being protected in this case. The Debtors submit that the best way to ensure that NRA members are adequately represented in this case is to ensure that any official NRA member committee be fairly representative of the NRA's overall membership and not be composed of a core-group of current and former NRA board members with a shared viewpoint. To that end, the Debtors propose that they be permitted to assist in the canvassing of NRA members to solicit membership on any official or informal advisory committee appointed in this case. To ensure that the committee reflects a diversity of viewpoints, the Debtors also suggest that the number of Movants appointed to the committee be limited or, alternatively, that sitting board members not be eligible to serve on the committee. Regardless of the manner in which a committee is constructed, the Debtors submit that the committee should be independent from the Movants and that it would be particularly inappropriate to simply convert the Movants' *ad hoc* group into an official committee.

D. The Scope and Role of an Official NRA Member Committee Should be Appropriately Tailored to Member-Specific Issues

13. The Debtors believe that the interests of the NRA's creditors and members will be largely aligned on the overwhelming majority of issues that will arise in this case. *See Eastman Kodak*, 2012 WL 2501071, at *3. As a result, the Debtors submit that the scope and role of an official member committee be appropriately tailored to focus solely on member-specific issues and limited in a manner that will ensure there is no duplication of efforts (and costs) with the existing creditors' committee.

Dated: April 16, 2021

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 16, 2021 a true and correct copy of the foregoing was served via first class U.S. mail on the parties named on the attached Master Service List.

/s/ John D. Gaither

John D. Gaither

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